

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEBRASKA**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

\$4,698,514.00 in United States Currency;

\$630,680.00 in United States Currency;

\$2,033,094.98 in Funds Seized from JP  
Morgan Chase Account;

\$205,358.00 in Funds Seized from Rago  
Wright Account;

KAWS “Close the Door Behind You”  
Painting;

Andy Warhol Apple Painting;

Edward Bell’s “David Starts to Make Up for  
Scary Monsters” 1980 Polaroid;

Rolex Daytona Chronograph Watch;

Audemars Piquet Oak Offshore  
Chronograph Watch;

Patek Philippe Aquanaut Watch;

Rolex Day-Date 36 President Watch;

Rolex “Hulk” Submariner Watch;

Rolex 18K Yellow Gold Datejust Watch  
with 36mm case;

Rolex 18K Yellow Gold Datejust Watch  
with 26mm case;

Rolex President Day-Date 18k Rose Gold  
Watch;

Civil No. 8:24-CV-160

**VERIFIED STATEMENT OF RIGHT AND  
INTEREST OF FRANCESCA TOSTI**

Platinum and Diamond 3 Stone Ring;  
Silver Metal and Diamond 36MM Bezel;

14K White Gold and Diamond Tennis  
Bracelet;

Australian Gold Lunar \$100 Coin;

Counterfeit Cartier 18K Love Bracelet;

Hermès Grand Attelage Flatware;

Tiffany & Co. Platinum and Diamond Ring;

Tiffany & Co. 18K Yellow Gold and  
Yellow Diamond Ring;

18K Yellow Gold and Diamond Ring;

Art Smith Modernist Brass Necklace;

18K Yellow Gold Necklace;

Art Smith Modernist Brass and Copper Cuff  
Bracelet;

Art Smith Modernist Copper Bracelet;

18K Yellow Gold Curb Link ID Bracelet;

Pair of Art Smith Modernist Ear Clips;

Pair of Art Smith Modernist Ear Pendants;

George Nakashima American Black Walnut  
Double Settee;

Set of East Indian Laurel Wood Dining  
Chairs;

East Indian Laurel Wood Dining Table;

George Nakashima American Black Walnut  
Coffee Table;

George Nakashima Seat Lounge Chair;

Pair of Mira Nakashima Grajalas  
Nightstands;

George Nakashima Dovetailed Double  
Dresser;

Wood Bed Frame;

Arthur Espenet Carpenter II Cabinets;

Arthur Espenet Carpenter II Headboard;

Arthur Espenet Carpenter II Mahogany Slab  
Headboard;

Wood Cube Side Table;

Arthur Espenet Carpenter II Mushroom  
Chest;

Jean Prouvé Sideboard;

JD Blunk Redword Sculpture;

Isamu Noguchi Kaki-Persimmons  
Galvanized Steel;

Isamu Noguchi Messenger 2B Bronze Plate;

George Nakashima Grass Seated Stool;

Sori Yanagi Butterfly Stool;

Perre Jeanneret Teak and Enameled Steel  
Stools;

Costa Rican Ceremonial Volcanic Stone  
Metate;

Wharton Esherick 2 Ash Chairs;

Axel Einar Hjorth Uto Coffee Table;  
Blue Nazca Textile;  
  
Framed Nazca Textile Woven Fabric;  
  
Arthur Espenet Carpenter II Wooden Chest;  
  
Arthur Espenet Carpenter II Low Table;  
  
Native American Stone Tool with Incised  
Features;  
  
Native American Stone Tool with Long  
Implement;  
  
George Nelson Pill Clock;  
  
Charles Eames Child's Chair;  
  
Isamu Nogushi "Rudder" stool;  
  
Greta M. Grossman Cobra Table Lamp;  
  
Eames LTR Side Table;  
  
Arthur Espenet Carpenter II Bookshelf  
Cabinets;  
  
Massim Lime Spatula;  
  
Olmec Stone Figure;  
  
Olmec Implement,  
  
Defendants.

**VERIFIED STATEMENT OF RIGHT AND INTEREST  
OF FRANCESCA TOSTI**

Pursuant to the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture  
Actions, Rules C and G (5)(a)(i)(A-D), Francesca Tosti does, on her own behalf, and in her

capacity as

Administrator of the Estate of James Reja, hereby submit her Verified Statement of Right and Interest as follows:

**A. Identification of Specific Property**

Francesca Tosti identifies the following specific property in which she has a right and interest:

**Cash:**

\$2,033,094.98 in Funds Seized from JP Morgan Chase Account;

**Furniture Items:**

- (1) George Nakashima American Black Walnut Double Settee;
- (2) Set of East Indian Laurel Wood Dining Chairs;
- (3) East Indian Laurel Wood Dining Table;
- (4) George Nakashima American Black Walnut Coffee Table;
- (5) George Nakashima Seat Lounge Chair;
- (6) Pair of Mira Nakashima Grajalas Nightstands;
- (7) George Nakashima Dovetailed Double Dresser;
- (8) Wood Bed Frame;
- (9) Arthur Espenet Carpenter II Cabinets;
- (10) Arthur Espenet Carpenter II Headboard;
- (11) Arthur Espenet Carpenter II Mahogany Slab Headboard;

- (12) Wood Cube Side Table;
- (13) Arthur Espenet Carpenter II Mushroom Chest;
- (14) Jean Prouvé Sideboard;
- (15) JD Blunk Redword Sculpture;
- (16) Isamu Noguchi Kaki-Persimmons Galvanized Steel;
- (17) Isamu Noguchi Messenger 2B Bronze Plate;
- (18) George Nakashima Grass Seated Stool;
- (19) Sori Yanagi Butterfly Stool;
- (20) Perre Jeanneret Teak and Enameled Steel Stools;
- (21) Costa Rican Ceremonial Volcanic Stone Metate;
- (22) Wharton Esherick 2 Ash Chairs
- (23) Axel Einar Hjorth Uto Coffee Table; Blue Nazca Textile;
- (24) Framed Nazca Textile Woven Fabric;
- (25) Arthur Espenet Carpenter II Wooden Chest;
- (26) Arthur Espenet Carpenter II Low Table;
- (27) Native American Stone Tool with Incised Features;
- (28) Native American Stone Tool with Long Implement;
- (29) George Nelson Pill Clock;
- (30) Charles Eames Child's Chair;
- (31) Isamu Nogushi "Rudder" stool;
- (32) Greta M. Grossman Cobra Table Lamp;
- (33) Eames LTR Side Table;

(34) Arthur Espenet Carpenter II Bookshelf Cabinets;

(35) Massim Lime Spatula;

(36) Olmec Stone Figure;

(37) Olmec Implement,

**Jewelry Items:**

*See Exhibit 1.*

**Fine Arts Items:**

Edward Bell's "David Starts to Make Up for Scary Monsters" 1980 Polaroid.

**B. Identification of Claimant and Claimant's Right and Interest in Property**

Francesca Tosti was married to James Reja until November 13, 2023, the date Mr. Reja was unlawfully killed by agents of the U.S. Marshall's Office, the Department of Homeland Security, Homeland Security Investigations, and Immigration and Customs Enforcement (ICE). Francesca Tosti is also the Administrator of the Estate of James Reja under an Order for Probate issued by the Mendocino Superior Court in Fort Bragg, California. Francesca Tosti is also a woman who has money of her own.

As to the cash, Ms. Tosti has a community property interest, separate interest, and a possessory interest in that property that was wrongfully seized as it was from the sale of a home that was community property, purchased with monies that are not related to any of the allegations of criminal activity set forth in the Complaint and, in part, from her personal funds, she was an innocent homeowner, and the amount seized would constitute an excessive fine under the 8<sup>th</sup> Amendment of the U.S. Constitution. Ms. Tosti reserves the right to add additional bases for her interest in this property and additional defenses to its wrongful seizure and attempted forfeiture.

As to the furniture, a community property interest, separate interest, and a possessory interest in that property that was wrongfully seized as it was purchased with monies that are not

related to any of the allegations of criminal activity set forth in the Complaint and, in part, from her personal funds, she was an innocent homeowner, and the amount seized would constitute an excessive fine under the 8<sup>th</sup> Amendment of the U.S. Constitution. Ms. Tosti reserves the right to add additional bases for her interest in this property and additional defenses to its wrongful seizure and attempted forfeiture.

As to the jewelry items, Ms. Tosti has a personal interest, community property interest, and possessory interest in this property as they are either (a) heirloom jewelry given to her or her minor daughter by her grandparents or parents, (b) purchased by her using her own funds, or (c) given as a gift by James Reja prior to 2012. The notified attorneys have already been provided a list of these items along with an explanation of the ownership and possessory interest for each item, which is attached hereto as **Exhibit 1**. As such, these items were either gifts, purchased with monies that are not related to any of the allegations of criminal activity set forth in the Complaint, purchased with her personal funds, she innocently owned and possessed these items, and the amount seized would constitute an excessive fine under the 8<sup>th</sup> Amendment of the U.S. Constitution. Ms. Tosti reserves the right to add additional bases for her interest in this property and additional defenses to its wrongful seizure and attempted forfeiture.

As to the fine arts item, Ms. Tosti has a personal interest, community property interest, and possessory interest in this property. This item was a gift, purchased with monies that are not related to any of the allegations of criminal activity set forth in the Complaint, purchased, in part, with her personal funds, she innocently owned and possessed this item, and its seizure would constitute an excessive fine under the 8<sup>th</sup> Amendment of the U.S. Constitution. Ms. Tosti reserves the right to add additional bases for her interest in this property and additional defenses to its wrongful seizure and attempted forfeiture.



C. Signature of Claimant Under Penalty of Perjury

I, Francesca Tosti, on my own behalf, and in my role as Administrator of the Estate of James Reja, hereby state, under the penalty of perjury, under the laws of the United States, and the State of California, that the foregoing statements are true and correct to the best of my knowledge. Signed this 22<sup>nd</sup> day of July, 2024, in Elk, California.

BY: 

Francesca Tosti

In her personal capacity, and as Administrator of the Estate of James Reja

D. Government Attorneys Served

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Dated: July 22, 2024

Respectfully submitted,

BY: */s/ Robert C. Matz*

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on July 22<sup>nd</sup>, 2024, the undersigned caused the foregoing to be filed with the United States District Court for the District of Nebraska using the CM/ECF system, which will send notification of such filing to the following CM/ECF participants:

KIMBERLY C. BUNJER, #20962  
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Attorney for Plaintiff

The undersigned further certifies that on July 22, 2024, the undersigned caused a true and correct copy of the foregoing to be served, by depositing a copy in the United States Mail, First Class postage pre-paid, upon the following non-CM/ECF participants: Kim Bunjer, Mikala Purdy-Steenholdt:

BY: */s/ Robert C. Matz*

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Robert C. Matz  
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# Exhibit 1

# **SEIZED ITEMS FROM ELK CALIFORNIA ON DECEMBER 13, 2023**

	Item Number	Object	Explanation	Notes
<input type="checkbox"/>	006-B	Swiss Bed	This is a bed of no importance was purchased from a company called CBH wood working	
<input type="checkbox"/>	026	Vitra Clock	This is a reproduction clock from Vitra Museum	
<input type="checkbox"/>	0001	Rolex Watch	One of my mothers rolexes	
<input type="checkbox"/>	0002	Rolex Watch	My mothers watch	
<input type="checkbox"/>	0003	swatch watch	watch given to my daughter from her grandfather	
<input type="checkbox"/>	0004	Omega Watch	my mothers watch given to her by her father	
<input type="checkbox"/>	0005	Ebel watch	My grandmothers watch given to her by my grandfather	
<input type="checkbox"/>	0006	lighter	my grandfathers lighter	
<input type="checkbox"/>	0007	dupont lighter	my grandfathers lighter	
<input type="checkbox"/>	0008	amethyst ring	my grandmothers ring	
<input type="checkbox"/>	0009-1	jade ring	my mothers ring	
<input type="checkbox"/>	0009-2	simulated ring	my mothers ring	
<input type="checkbox"/>	0010	signet ring	my mothers ring	
<input type="checkbox"/>	0011	snake ring	my own ring purchased with	

			money or exchange for my job as jewelry photog	
<input type="checkbox"/>	0012	X ring	my purchase with the jewelry photog job I had	
<input type="checkbox"/>	0013	two finger ring	my purchase with the jewelry photog job I had	
	0014	double v ring	my own purchase	
<input type="checkbox"/>	0015	onyx ring	my mothers ring	

	Item Number	Object	Explanation	Notes
<input type="checkbox"/>	0016	diamond and ruby ring	my mothers ring	
<input type="checkbox"/>	0017	arrow ring	my own purchase/exchange for photog work	
<input type="checkbox"/>	0018-1	diamond ring	my moms ring	
<input type="checkbox"/>	0018-2	black diamond ring	my own purchase/exchange for photog work	
<input type="checkbox"/>	0018-3	diamond Tiffany ring	my ring given as a promise ring 2011	
<input type="checkbox"/>	0018-4	diamond ring	my own purchase	
<input type="checkbox"/>	0018-5	diamond ring	my own purchase	
<input type="checkbox"/>	0018-6	blackened diamond ring	my own purchase	
<input type="checkbox"/>	0018-7	Tiffany diamond bad	gift from my husband 2012	
<input type="checkbox"/>	0019	carnelian ring	my mothers ring	
<input type="checkbox"/>	0020	labradorite ring	my purchase	
<input type="checkbox"/>	0021	silver Tiffanys ring	my mothers ring	
<input type="checkbox"/>	0022	diamond ring	my mothers wedding ring	
<input type="checkbox"/>	0023	costume ring	this is literal junk.	

<input type="checkbox"/>	0024	diamond band	my wedding band.... of utmost personal meaning  2012	
<input type="checkbox"/>	0025	signet ring	gift from my parents at my 16th birthday	
	0026	enamel ring	my mothers ring	
<input type="checkbox"/>	0027	sliced diamond ring	my purchase	
<input type="checkbox"/>	0028	yellow diamond ring	engagement ring that was my grandmothers... very personal item	
<input type="checkbox"/>	0029	diamond engagement ring	my engagement ring that was made from a vintage pair of earrings (from my family)by my jeweler friend.... personal item... very personal	
<input type="checkbox"/>	0030	morganite ring	my purchase, I made with a jeweler friend	
<input type="checkbox"/>	0031	horn necklace	my purchase	
<input type="checkbox"/>	0032	art smith necklace	gift from my husband pre 2012	
<input type="checkbox"/>	0033	coral bead necklace	my mothers	
<input type="checkbox"/>	0034-1	pearl necklace costume	my mothers	
<input type="checkbox"/>	0034-2	cultured pearl	my mothers	



		necklace		
<input type="checkbox"/>	0035-1	gold geometric necklace	again my mothers	
<input type="checkbox"/>	0035-2	yellow gold necklace	my mothers	
<input type="checkbox"/>	0036	silver necklace	my fathers	
<input type="checkbox"/>	0037	ruby necklace	my purchase	
<input type="checkbox"/>	0038	triple moon necklace	my design and purchase	
<input type="checkbox"/>	0039	rose gold and diamond necklace	my purchase	
<input type="checkbox"/>	0040	Eames Necklace	my purchase and design for my daughter	
<input type="checkbox"/>	0041	coral pendant necklace	my mothers necklace	
<input type="checkbox"/>	0042	moon necklace	my purchase	
<input type="checkbox"/>	0043	sliced diamond necklace	my purchase	
<input type="checkbox"/>	0044	antique bracelet	this was my grandfather's sisters	

<input type="checkbox"/>	0045	J&F necklace	my purchase	
<input type="checkbox"/>	0046	silver J necklace	my father's for my mom Joanne	
<input type="checkbox"/>	0047	costume necklace	costume jewelry	
<input type="checkbox"/>	0048	crescent necklace	my purchase again this style is super easy to pick out,,,all rose gold diamond jewelry from my photog job	
<input type="checkbox"/>	0049	cross diamond necklace	gift from my parents when I turned 10	
<input type="checkbox"/>	0050	bar necklace	my purchase	
<input type="checkbox"/>	0051	labradorite necklace	my purchase and design I made for my daughter	
<input type="checkbox"/>	0052	bar necklace	my purchase	
<input type="checkbox"/>	0053	art smith bracelet	given to me by my husband definitely pre 2012	
<input type="checkbox"/>	0054	art smith bracelet	given to me by my husband definitely pre 2012	
<input type="checkbox"/>	0055	gold link bracelet	clearly my moms since it says Juanita	
<input type="checkbox"/>	0056	pearl bracelet	my moms	

<input type="checkbox"/>	0057	costume bracelet	my mothers	
<input type="checkbox"/>	0058	link bracelet	given to me as a child	
<input type="checkbox"/>	0059	triple moon goddess bracelet	my design my purchase	
<input type="checkbox"/>	0060	pearl bracelet	my purchase from my photog job	
<input type="checkbox"/>	0061	white topaz bracelet	my purchase from my photog job	
<input type="checkbox"/>	0062	geode bracelet	my purchase from my photog job	
<input type="checkbox"/>	0063	moonstone and labradorite bracelet	my purchase from my photog job	
<input type="checkbox"/>	0064	ruby bracelet	my purchase from my photog job	
<input type="checkbox"/>	0065	costume pearl earring	my mothers	
<input type="checkbox"/>	0066	nephrite pendant	my mothers	
<input type="checkbox"/>	0067	carnelian pendant	my mothers	
<input type="checkbox"/>	0068	heart pendant	my mothers	

<input type="checkbox"/>	0069	Star of David	my mothers	
<input type="checkbox"/>	0070	pig pendant	my mothers I think I don't know	
<input type="checkbox"/>	0071	pink tourmaline	my purchase when I was designing jewelry	
<input type="checkbox"/>	0072	aquamarine	my purchase when I was designing jewelry	
<input type="checkbox"/>	0073	abalone	funny there is a price this... found on the beach	
<input type="checkbox"/>	0074	watermelon tourmaline	my purchase when I was designing jewelry	
<input type="checkbox"/>	0075	blue topaz	my purchase when I was designing jewelry	
<input type="checkbox"/>	0076	crystal pyramid	gift given to me by my Best friend 1999	
<input type="checkbox"/>	0077	moonstone	my purchase when I was designing jewelry	
	0078	labradorite	fell off a piece of costume jewelry	
<input type="checkbox"/>	0079	costume brooch	my mothers	
<input type="checkbox"/>	0080	shell cameo	my mothers	

<input type="checkbox"/>	0081-1	diamond hoop earrings	these are rose gold....these are my purchase	
<input type="checkbox"/>	0081-2	star ear crawlers	my purchase from my jewelry photog job	
<input type="checkbox"/>	0081-3	diamond yellow gold hoop earrings	my mothers	
<input type="checkbox"/>	0081-4	white gold earrings	gift I gave my mother	
<input type="checkbox"/>	0081-5	diamond star and lighting bolt earrings	my purchase dong photog and running her instagram	
<input type="checkbox"/>	0081-6	white topaz earrings	same same... my purchase	
<input type="checkbox"/>	0081-7	rose gold detachable earrings	my purchase	
<input type="checkbox"/>	0081-8	white gold earrings	same same my purchase/exchange for work... all of this started way before 2012 probably 2010	
<input type="checkbox"/>	0081-9	rose gold ear climbers	my purchase	
<input type="checkbox"/>	0081-10	these are rose not yellow gold ear cuffs	my purchase	
<input type="checkbox"/>	0081-11	diamond micro pave hoop earrings	my purchase	
<input type="checkbox"/>	0081-12	triangle earrings	my purchase when working with jeweler... photog, running insta and jewelry parties	

<input type="checkbox"/>	0081-13	rose gold stud heart earrings	my purchase	
<input type="checkbox"/>	0081-14	diamond stud earrings	my purchase all of these are around 2012	
<input type="checkbox"/>	0081-15	sliced diamond earrings	again my purchase	
<input type="checkbox"/>	0081-16	rose stud in white gold	gift I gave my mother	
<input type="checkbox"/>	0082-1	yellow gold hoop earrings	my mothers	
<input type="checkbox"/>	0082-2	hoop diamond earrings	my mothers	
<input type="checkbox"/>	0082-3	pyramid stud earrings	my purchase	
<input type="checkbox"/>	0082-4	knot earrings	my mothers	
<input type="checkbox"/>	0083	silver studs	my mothers	
<input type="checkbox"/>	0084	yellow gold and turquoise earrings	my mothers	
<input type="checkbox"/>	0085-1	art smith earrings	gift from my husband pre 2012 probably around 2011	
<input type="checkbox"/>	0085-2	art smith	gift from my husband pre 2012	



0072	aquamarine	my purchase when I was designing jewelry	
0086-1	labradorite earrings	my purchase for my wedding	
0086-2	large labradorite earrings	my purchase for my wedding	
0087	aventurine earrings	gift I gave my mother	
0088	moonstone earrings	my own purchase	
0089	moonstone pendants	my own purchase	